

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

Leila Green Little, *et al.*,

Plaintiffs,

v.

Llano County, *et al.*,

Defendants.

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Civil Action No. 1:22-cv-00424-RP

RESPONSE TO DEFENDANTS' NOTICE TO THE COURT

Counsel for Plaintiffs regret the need to burden the Court with additional legal filings, but believe it is necessary to file a brief response to maintain the integrity of the public legal record.

Defendants' claim that Plaintiffs "have acknowledged and corrected some of the false statements" in the briefing is incorrect. See Notice at 1. To be clear, none of Plaintiffs' briefs contain any "false statements," and Plaintiffs have not "acknowledged" any "false statements" to this Court, as the notice suggests. Separately, to the extent the notice seeks to create the impression that Plaintiffs have agreed that Defendants are entitled to further briefing on the application for injunctive relief, there is no such agreement.

Plaintiffs will respond directly in due course to Defense counsel's most recent correspondence threatening a Rule 11 motion and will comply with the requirements of the Federal Rules, including the obligation to meet and confer in good faith prior to engaging the Court. As counsel and the Court well know, an unjustified motion under Rule 11 may itself subject the movant to sanctions and require the attorney or party to pay the respondent's attorneys' fees. In the meantime, Plaintiffs are hopeful that there will be no further need to burden this Court with unnecessary filings.

Dated: January 12, 2023

Respectfully submitted,

/s/ Ellen Leonida

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CERTIFICATE OF SERVICE

I hereby certify that on January 12, 2023, a true and correct copy of the foregoing document was served on all counsel of record who have appeared in this case using the Court's CM/ECF system as a Filing User.

/s/ Ellen Leonida

Ellen V. Leonida